

Exhibit 20

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**Admitted pro hac vice*
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

EQUALITY STATE POLICY CENTER,)	
)	
Plaintiff,)	
v.)	
)	
CHUCK GRAY , in his official capacity as)	Civil Action No. 25-cv-00117-SWS
Wyoming Secretary of State, <i>et al.</i> ,)	
)	
Defendants.)	

**DECLARATION OF JENNIFER DESARRO IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY INJUNCTION**

I, Jennifer DeSarro, declare as follows in support of Plaintiff's Motion for Preliminary Injunction:

1. I am over the age of 18, have personal knowledge of the facts below, and can competently testify to their truth.

2. My name is Jennifer DeSarro. I was born in Wyoming, and I have lived in

Wyoming for over 30 years.

3. I am currently the Executive Director of the Equality State Policy Center. I started at Equality State Policy Center as an interim Executive Director in February 2024. In October 2024, I was asked to stay on as permanent Executive Director. In this role, I am responsible for executing the Board's strategic vision for Equality State Policy Center including liaising with the Board and our coalition organization members; supervising and supporting staff who implement much of the programmatic work; managing the budget and fundraising efforts; fostering relationships; and ensuring our operations run at an optimal level.

4. Equality State Policy Center is a nonprofit organization consisting of a broad-based coalition of about twenty Wyoming organizations doing work in areas of social justice, conservation, and labor. Our mission is to advance fair elections and transparent government in support of all Wyoming communities. Helping qualified Wyomingites register to vote and successfully participate in Wyoming elections is core to that mission.

5. Equality State Policy Center was founded in 1993 by eleven organizations working on conservation, labor, and social justice issues for the purpose of conducting research, educational and organizing activities relating to public policy issues, principles of democracy and accountable government in Wyoming. These visionaries believed joining together to ensure principles of democracy like transparent government and fair elections was essential for them to carry out their individual organizational missions and advance their own issue-based work. Over its thirty years, Equality State Policy Center has undertaken a range of programs, initiatives, and projects for our member organizations, including the Gender Lens Project, the Electoral Research Project, The Chair Project, and The Legislative Accountability Project, and has dived into specific research on topics relevant to issues of the time, ranging from Campaign Finance (2023-24) to producing a

Calendar of Election Activities for Non-Profit Organizations (2004). ESPC has consistently advocated on behalf of our vision and mission in the public policy domain of Wyoming throughout its existence. We have also served as an incubator for initiatives that have now blossomed into their own non-profits such as the Coalition for Healthy Retirement and Healthy Wyoming.

6. Today, Equality State Policy Center remains connected to its member organizations, which is reflected in our Board composition. Eight of our thirteen Board seats are reserved for and filled by individuals who are or were employed or served by our member organizations. Before I joined the Equality State Policy Center as Executive Director, I served on its Board of Directors for approximately six years, first as the representative of the Greater Yellowstone Coalition and later as the first non-organizational board member representative.

7. Every organization in the coalition pays membership dues to Equality State Policy Center, and they rely on Equality State Policy Center to further their collective vision of a thriving representative democracy where every Wyomingite is empowered to use their independent voice and public institutions are shaped by and responsive to the people they serve. Exercising an individual's legal right to vote is a cornerstone of this shared vision. Many of our coalition organizations have individual members qualified to vote in Wyoming, so part of advancing our mission is working to ensure that those Wyomingites can participate in honest and secure elections without unnecessary barriers.

8. If something significant happens in Wyoming elections that makes it harder to vote, our member organizations' members and constituents may be impacted because they may not be able to vote in elections to select government representatives whose decisions are likely to affect them. This, in turn, means their values may not be represented in the outcomes of those elections. When the voting pool is diminished, elected representatives' perspectives are also potentially

diminished, leading to less representative policy decisions which could negatively affect the collective or individual missions of our member organizations. Hence, our member organizations expect us not only to take action to address the issue and reduce any harm it will cause to voters, but also to help our member organizations understand and respond to the implications for their members and constituents. We keep our member organizations updated throughout the legislative session regarding bills pertinent to elections and transparent government, and year-round with presentation opportunities. We provide education tools to our member organizations to help them share important dates and voter-related law changes with their members. We also provide a legislative accountability project report that is aimed at encouraging Wyomingites to have conversations with their elected officials to foster relationship and understanding of issues concerning the variety of people and communities of Wyoming to our member organizations, who can then share with their members and constituents. Just last week, I gave a presentation to one of our member organizations, the Wyoming Public Employees' Association, which included an overview of the 45 election-related bills—including HB 156—considered during the Wyoming state legislature this past general session in early 2025, as well as the elections-related bills the Wyoming Legislative Corporations, Elections, & Political Subdivisions Committee is entertaining during this current interim session.

9. At Equality State Policy Center, we believe that in order to have fair elections, we need as many eligible voters as possible to participate in them. Wyoming struggles with low registration and voter turnout. Equality State Policy Center works to address this problem through voter outreach and mobilization programs, including tabling, webinars, and creating and distributing materials explaining how to register and vote. Equality State Policy Center also engages in direct conversations with voters in the community to learn where there are gaps in

people's knowledge or barriers to voting, all of which helps us to better meet voters where they are and provide them with more useful resources and assistance to help them become civically engaged. We also use the stories of the people we encounter to inform evaluation of potential policy changes and share what we learn with decision makers when appropriate. Equality State Policy Center has also developed The Chair Project directed at increasing civic participation in Wyoming's Hispanic communities, as an underrepresented community. Through The Chair Project, we introduce community members to seats of government such as the State Capitol and local City Hall and offer a basic overview of what happens in these buildings and how citizens can engage with their local elected officials in those places. Another component to the work of The Chair Project is growing voter turnout and citizen leadership in these communities. Equality State Policy Center creates and distributes voter education materials in Spanish and as we are able—limited by staff capacity—answers Spanish-speaking voters' questions relevant to the community.

10. While HB 156 was introduced in the legislature, I was immediately concerned about how it would impact Equality State Policy Center, our members, and the constituencies we work to enfranchise. Because of our focus on voter education and access, HB 156 will dominate Equality State Policy Center's work at least until the 2026 general election and likely after that, as well. We cannot advance our mission or serve our coalition members without educating voters about HB 156's DPOC requirement, especially because our member organizations have individual members who are qualified to vote but will be hampered or even completely prevented from voting because of HB 156's DPOC requirement, either because they do not have the documents that HB 156 requires in order to register easily available and may not have time or resources to procure them in the time needed, or because they will not be able to access them when they register to vote.

11. For example, we have several labor organizations in our coalition whose members

are on the road a lot, perhaps operating road construction machinery or working on trains, and may store their DPOC-required documents in a safe, stable location away from where they reside when not on the job. These members may be deterred from registering if it requires retrieving the documents from another location, registering, and then returning documents to their secure location within the window they have off from work. Our membership also includes an organization that serves victims of domestic violence, who may not have access to an acceptable form of DPOC because they had to flee an abusive situation, and another organization that represents transgender people, who may not have current DPOC because they have changed their name and gender from birth.

12. Yet another situation that was just shared with me by a member of a member organization to Equality State Policy Center, was that of a dedicated voter of many years who found himself purged from the voter rolls upon showing up to vote in the 2024 election with his granddaughter in tow at a polling place where he had religiously voted for decades. He had to re-register to vote that day. Had HB 156 been enforceable at this time, he may have been disenfranchised as a multi-decade consistent voter because he may have not been able to locate the required DPOC documents back at home or within his safety deposit box, which is accessible only during bank business hours, in time to re-register and vote prior to the polls closing that day. He also remains confused and frustrated that he was purged in the first place given his long track record of voting, he lived in his same residence, his name had not changed, and obviously he had not died. Even while the legislature was debating HB 156, coalition members and members of the public were turning to Equality State Policy Center seeking assistance and information about how it will impact them and how to best respond.

13. Based on my experience in my work with Equality State Policy Center in and

involving Wyoming elections, and especially with communicating with the public about other voting restrictions that were passed before the 2024 election cycle, I know that communicating the DPOC requirements to voters will require consistent attention, a massive amount of work, new tactics, and significantly more funding. Our current resources are likely not enough to do what is necessary to protect our mission and do the outreach necessary to reach our members as well as the general Wyoming public who stand to be affected by HB 156. So, Equality State Policy Center will have to raise a lot more money in order to be able to effectively and meaningfully communicate with voters about how HB 156 will affect them and work to address its burdensome and disenfranchising effects.

14. Our efforts to inform voters in the Hispanic community will be especially challenging. We have one bilingual staff member, who not only leads The Chair Project and facilitates much of our social media content, but also oversees the coordination of our training events, including RUN WY—which encourages people to run for office; SHAPE WY—which teaches citizens how to engage with their legislators regarding their values; and People’s Review Live Webinars—which bring experts together to discuss policies and research relevant to Wyomingites. To my knowledge, our bilingual staff member is one of the only Spanish-speaking people who works on election issues in this state. Because she will need to dedicate her time to educating Hispanic voters about the effects of HB 156, she will not be able to spend the necessary time advancing the other long-term projects she leads for us. I expect voter outreach to be especially important in the Hispanic community because, according to my staff, Hispanic voters have already approached us expressing fears about the law and being targeted by ICE because the law instructs clerks to reject documents that show any “indication” a person is a non-citizen. U.S. citizens of Hispanic ethnicity have expressed fears to ESPC staff that they could be falsely accused

of being non-citizens and even investigated or arrested if they try to register to vote.

15. Beyond our member organizations and newsletter subscribers, we will need to embark on an aggressive general public education and awareness campaign. Equality State Policy Center will have to spend significant time and resources, including both staff time and money, to reach new audiences, some of which may already feel inundated with information in today's media heavy world. Having spent my primary years as a girl attending Wyoming schools and learning of Wyoming's historic step for women's suffrage, I am particularly sensitive to the implications of HB 156 as a discouraging rollback for women's suffrage within the state that once led the nation, earning its motto as the "Equality State." Women commonly change their names because of marriage or divorce which creates an often-unexpected burden when registering to vote. For example, when a woman who has changed her last name goes to register to vote, unlike her male counterpart, she will not be able to do so without additional documentation, such as her marriage license, in order to validate her birth certificate, which likely states her maiden name. The potential burden is even greater if she has to secure a copy from the county office where she filed her marriage license and that county is out of state, which may cost money and time. If this woman has to take time off from work or secure daycare for children to register to vote, only to discover she is missing documentation, then she may have to take more time off or invest in more daycare in order to secure that documentation and go back to register to vote. Another challenge that exists for a woman is that other allowable forms of identification also have to be changed in accordance with the marriage or divorce, which are additional steps beyond those needed for a typical renewal of an expired license. Currently a woman only needs to show a passport, driver's license, tribal ID, WY Student ID, or an ID card issued by local state or federal agency along with signing the voter registration oath to register to vote in Wyoming. Another reason the DPOC requirement will

require so much of Equality State Policy Center's time and resources is that Wyoming purges tens of thousands of voters simply because they don't vote in one election, or as my previous example illuminates, get purged for unknown reasons, perhaps they have a similar name to someone who died. As a result, a major portion of the voting population will need to re-register and satisfy the DPOC requirements before they can vote again in upcoming elections. Given Wyoming's low voter turnout, the push to inspire Wyomingites to register or re-register to vote with extra paperwork can seem daunting.

16. Because of our limited budget, we have to sacrifice some of our key priorities to address the DPOC requirement. Equality State Policy Center runs several proactive initiatives, including a Transparent Government Engagement, Advocacy, and Research Initiative which aims to empower Wyoming citizens with information, tools, and skills that better enable their participation in Wyoming's government, ensuring representation, honesty, and respect for the rights and freedoms of all Equality State communities. ESPC hosts training programs such as SHAPE WY and RUN WY, along with educational webinars on issues important to Wyomingites through People's Review Live and co-hosting programs like Tax Facts Lunch and Learn. In addition, ESPC compiles research and works to safeguard policies that foster trust, accountability, fair process and participation in Wyoming's government. Because of the passage of HB 156, Equality State Policy Center is already allocating staff time that would otherwise go to these initiatives and other projects. We anticipate needing to bolster our efforts to educate voters about the DPOC requirement, which is costly and requires a large investment of staff time and we don't know if we will be able to raise the funds and resources to do this.

17. For example, we had planned to do our RUN initiative in the fall, which aims to get people to think about running for office and planning campaigns. It is a good window to do this

work because it offers time for potential candidates to get the support of their employer; gather a campaign team to build their strategy; and raise funds. Most elected positions in Wyoming are part-time with modest stipends so candidates usually have a day job to negotiate, along with considering family and other obligations prior to running for office. We are no longer able to do RUN this fall because we need to focus on addressing the impact of HB 156, rather than planning, finding inspiring speakers, and marketing this training.

18. Equality State Policy Center has also had to pause its VOTE Wyoming project because we need to update our voter education materials to explain the DPOC requirement in HB 156. We have a wide range of material to update, including webinars, voter information cards, flyers, and our website, and we do all of this work in house. Plus we are coordinating with several partner organizations to reach more people. This all will take a lot of time, especially since we will also have to translate the materials into Spanish. Because the law is so vague about what counts as an “indication” that a person is not a U.S. citizen, we can’t even complete the updates to our educational materials until we get more information about how the law is going to be implemented in practice.

19. Along with our efforts to educate on bills that become laws, we also must monitor election related bills being considered during this interim to be brought to the 2026 Wyoming Legislative Session this winter. On May 8th, 2025, the Corporations, Elections, & Subdivisions Committee convened and upon the Secretary of State Chuck Gray’s recommendation is rekindling at least ten of the election related bills that failed during the 2025 Legislative Session. These are all bills Equality State Policy Center worked on during the session and must now continue, but again our ability to advocate on these is related to staff and financial capacities.

20. We are also missing what is usually a critical period for our voter registration efforts

because of HB 156. We learned from the 2024 elections that late spring and early summer before an election year are the best time to educate voters about basic civic responsibilities and the voting process, including registering to vote. That time period is a quiet window after the legislature is in session and before candidates announce that they are running for office. Once the candidates announce, those conversations can take over everything, so ideally we want to reach people before they are inundated with campaign flyers and candidate materials. Once the legislature is in session, following and communicating with our members and the public about legislation requires 90% of our time. Now until Thanksgiving is the window when we can really focus on voter registration and voter education without those distractions.

21. This is also a key time for registration because the clerks are less busy now than they will be when they are also handing out ballots closer to the election, so we want to encourage the public to register early.

22. But because we have had to pause our VOTE Wyoming project, we are missing the best window to do effective work on our voter outreach and education. If HB 156 had not passed, we would have already begun educating voters in advance of the 2026 elections.

23. I certify under penalty of false swearing that the foregoing is true.

Executed on this 23.00 day of May 2025.

at Cody, Wyoming
(city or other location, and state OR country)

Jennifer DeSarro

(printed name)



(signature)